

1. The Defendants' discovery was served on April 1, 2022. The Plaintiffs' responses and objections to Defendants' discovery are due on May 1, 2022.

2. The Defendants' discovery includes 47 items, not even counting subparts, and which requires substantial time to respond and object to. There has not yet been any agreement of the parties to exceed the limitation of twenty-five (25) interrogatories, although Plaintiffs' counsel is willing to consider a greater number and has so advised Defendants' counsel. Fed.R.Civ.P. 33(a)(1). The Plaintiffs' counsel has been very busy coordinating the completion of expert reports by Plaintiffs' expert witnesses which are due May 9, along with many other legal tasks in this and other cases. The Plaintiffs' counsel believes that just five (5) additional days will allow him to complete appropriate responses and objections.

3. An email was sent by Plaintiffs' counsel to Defendants' counsel on the morning of April 29 requesting additional time to complete responses and objections, but Defendants' counsel has not yet responded to this request.

4. This extension is sought in good faith and will not prejudice the Defendants.

WHEREFORE, the Plaintiffs respectfully request an extension of time until May 6, 2022, to serve their responses and objections to Defendants' discovery.

Respectfully submitted,

/s/ Thomas B. York
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May 1, 2022

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Thomas B. York, hereby certify that on May 1, 2022, I served a true and correct copy of PLAINTIFFS' FIRST MOTION FOR EXTENSION OF TIME TO SERVE RESPONSES AND OBJECTIONS TO "DEFENDANTS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS," through electronic filing, on the following:

Nicole Boland
Senior Deputy Attorney General
Office of Attorney General
15th Floor, Strawberry Square
Harrisburg, PA 17120

/s/ Thomas B. York
THOMAS B. YORK

CERTIFICATE OF NON-CONCURRENCE

I, Thomas B. York, hereby certify that I sent an email to Defendants' counsel on the morning of April 29, 2022, requesting additional time to serve responses and objections to Defendants' discovery, but Defendants' counsel has not yet responded.

/s/ Thomas B. York
THOMAS B. YORK